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May 29, 2025

VIA ECF

Hon. Ronnie Abrams
Thurgood Marshall United States Courthouse
40 Foley Sq.
New York, New York 10007

Re: *M.C. v. N.Y.C. Public Schools*, 25-2228 (RA)(KHP)

Dear Judge Abrams:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 90-day stay of this action until August 28, 2025. Plaintiff consents to this request and has agreed to provide the needed billing records (and a privilege log, if redacted for privilege) by May 30, 2025. On April 7, 2025, the Court granted Defendant's first request for an extension. (ECF 10). (Defendant's deadline to respond to the Complaint is currently July 24, 2025). We note that, while this is an IDEA fees-only case and liability appears not at issue, without the relevant billing, Defendant cannot begin its internal settlement review process, which includes review of the underlying administrative record together with the relevant billing records, and thereafter present a reasonable early offer of settlement. We have resolved recent similar IDEA fees-only cases brought by plaintiffs represented by the Roller firm without the need to burden the court with any sort of motion practice or conferences. The parties are hopeful this matter will be resolved as well.

I also respectfully request, with Plaintiff's consent, an extension of the briefing schedule approved by the Court (ECF 11) to the following proposed dates:

- Plaintiffs' motion for summary judgment due on October 20, 2025
- Defendant's opposition due on November 20, 2025
- Plaintiffs' reply due on December 10, 2025

I respectfully propose that, if a stay is granted, the parties be required to submit a joint status letter regarding settlement negotiations on or before August 28, 2025.

Thank you for considering these requests.

Respectfully submitted,

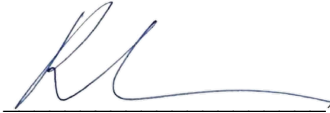
/s/ Marina Moraru

Marina Moraru, Esq.
Special Assistant Corporation Counsel

cc: Irina Roller (via ECF)

Application granted. This action is hereby stayed for ninety (90) days from the date of this order. The parties shall submit a joint status letter on August 28, 2025. The Court adopts the briefing schedule proposed above.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'R. Abrams', written over a horizontal line.

Hon. Ronnie Abrams
May 30, 2025